

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

-----X

In re: PROMESA
Title III

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of No. 17 BK 3283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*, (Jointly Administered)

Debtors.¹

-----X

**INFORMATIVE MOTION REGARDING OMNIBUS CLAIM OBJECTIONS
SCHEDULED TO BE HEARD AT JANUARY 14, 2021 HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court's *Order Regarding Procedures for Hearing on January 14, 2021* [Case No. 17-3283, ECF No. 15565] (the "Procedures Order")², the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board"), as representative of the

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Procedures Order requires counsel who intend to speak to jointly file an informative motion regarding, *inter alia*, the speakers and time allocations. At present, the Oversight Board is not aware of counsel who intend to appear and speak on behalf of the claimants scheduled for the January 14, 2021 hearing.

Commonwealth of Puerto Rico (the “Commonwealth”) pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),³ the Oversight Board respectfully states as follows:

1. Laura Stafford and/or Brian S. Rosen of Proskauer Rose LLP will appear telephonically at the January 14, 2021 hearing and seek to be heard on the following matters, as well as any and all objections, responses, statements, joinders, and replies thereto:

- *Ninety-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided* [Case No. 17-3283, ECF No. 9547]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *One Hundred Seventy-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient and Late-Filed Claims* [Case No. 17-3283, ECF No. 12125]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *One Hundred Seventy-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Subsequently Amended Claims* [Case No. 17-3283, ECF No. 12138]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *One Hundred Eighty-Second Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Claims Asserted Against the Incorrect Debtor* [Case No. 17-3283, ECF No. 12160]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *One Hundred Eighty-Fourth Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Subsequently Amended Claims* [Case No. 17-

³ PROMESA has been codified at 48 U.S.C. §§ 2101–2241.

3283, ECF No. 12850]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.

- *One Hundred Ninetieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to Subsequently Amended Claims* [Case No. 17-3283, ECF No. 12859]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *One Hundred Ninety-Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and Puerto Rico Highways and Transportation Authority to Duplicative Claims Asserted by Certain HTA Bondholders* [Case No. 17-3283, ECF No. 13406]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *One Hundred Ninety-Ninth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims Asserted by Holders of Certain PRASA Senior Lien Bonds* [Case No. 17-3283, ECF No. 13407]. The Oversight Board requests 4 minutes of the 12 minutes allocated to this matter.
- *Two Hundred First Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims Asserted by COFINA Bondholders* [Case No. 17-3283, ECF No. 13410]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *Two Hundred Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims for Which the Commonwealth of Puerto Rico Is Not Liable* [Case No. 17-3283, ECF No. 13409]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *Two Hundred Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Subsequently Amended Claims* [Case No. 17-3283, ECF No. 13412]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *Two Hundred Sixteenth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims Based on Investments in Mutual Funds* [Case No. 17-3283, ECF No. 13429]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *Two Hundred Twenty-Second Omnibus Objection (Substantive) of the Puerto Rico Electric Power Authority to Claims Asserting Liabilities for Bonds Sold by Claimants* [Case No. 17-3283, ECF No. 13436]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *Two Hundred Thirty-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation*

Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Miscellaneous Deficient Claims [Case No. 17-3283, ECF No. 13916]. The Oversight Board requests 4 minutes of the 12 minutes allocated to this matter.

- *Two Hundred Forty-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims with Respect to Which Deficient Mailing Responses Were Received* [Case No. 17-3283, ECF No. 14218]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *Two Hundred Fiftieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Satisfied Claims* [Case No. 17-3283, ECF No. 14222]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.
- *Two Hundred Twenty-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Duplicate Bond Claims* [Case No. 17-3283, ECF No. 13909]; *Two Hundred Twenty-Seventh Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to GDB Bondholder Claims for Which the Commonwealth Is Not Liable* [Case No. 17-3283, ECF No. 13911]; and *Two Hundred Twenty-Eighth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims Asserted by Holders of Certain PRASA Bonds and HTA Bridge Bonds* [Case No. 17-3283, ECF No. 13912]. The Oversight Board requests 2 minutes of the 6 minutes allocated to this matter.

[Remainder of Page Intentionally Left Blank]

Dated: January 11, 2021
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen

Martin J. Bienenstock

Brian S. Rosen

(Admission *pro hac vice*)

PROSKAUER ROSE LLP

Eleven Times Square

New York, NY 10036

Tel: (212) 969-3000

Fax: (212) 969-2900

*Attorneys for the Financial Oversight and
Management Board as representative for the
Debtors*

/s/ Hermann D. Bauer

Hermann D. Bauer

USDC No. 215205

O'NEILL & BORGES LLC

250 Muñoz Rivera Ave., Suite 800

San Juan, PR 00918-1813

Tel: (787) 764-8181

Fax: (787) 753-8944

*Co-Attorneys for the Financial Oversight and
Management Board as representative for the
Debtors*